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7 Attorney for Gina Marcks

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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 GINA MARCKS,

15 Defendant.

Case No. 2:19-cr-00315-JAD-NJK

**EMERGENCY<sup>1</sup> STIPULATION TO  
MODIFY CONDITIONS OF  
RELEASE TO ALLOW TRAVEL**  
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason Frierson, United  
18 States Attorney, and Jim W. Fang, Assistant United States Attorney, counsel for the United  
19 States of America, and Rene L. Valladares, Federal Public Defender, and Heidi Ojeda, Assistant  
20 Federal Public Defender, counsel for Gina Marcks, that the conditions of her release be  
21 modified to allow her to travel to Texas for the funeral of her sister provided that she provide  
22 pretrial services information about her travel plans in advance of her travel.

23 This Stipulation is entered into for the following reasons:  
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26 <sup>1</sup> This Stipulation is brought on an emergency basis due to the timing of the request.  
Mrs. Marcks sister just passed and the family planned the funeral for tomorrow, November 2,  
2023.

1           1.       Ms. Marcks was released on a PR Bond in December 2019. One of her  
2 conditions restricted her travel to Clark County, NV.<sup>2</sup>

3           2.       Since Mrs. Marcks release, she has been in continued compliance with Pretrial  
4 Services.

5           3.       Unfortunately, Mrs. Marcks sister just passed away. Her sister resided in Texas  
6 and the family has planned funeral services in Texas for Thursday, November 2, 2023. Mrs.  
7 Marcks is requesting permission to travel to Texas to attend the funeral and then immediately  
8 return to Las Vegas on Friday, November 3, 2023. Mrs. Marcks' daughter is in the process of  
9 making all the travel arrangements for her mother.

10          4.       Pretrial services does not oppose this request as long as Mrs. Marcks provides  
11 her travel itinerary in advance of her travel and updates pretrial services with any unexpected  
12 changes.

13          5.       The parties agree to this requested modification.

14               This is the first request for modification of conditions of release.

15               DATED this 2nd day of November, 2023.

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18       RENE L. VALLADARES  
19       Federal Public Defender

          JASON M. FRIERSON  
          United States Attorney

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21       By /s/ Heidi Ojeda  
22       HEIDI OJEDA  
          Assistant Federal Public Defender

          By /s/ Jim W. Fang  
          JIM W. FANG  
          Assistant United States Attorney

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          <sup>2</sup> ECF No. 31 at 2, Condition #20.

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 GINA MARCKS,

7 Defendant.  
8

Case No. 2:19-cr-00315-JAD-NJK

**ORDER**

9  
10 IT IS THEREFORE ORDERED that Mrs. Marcks conditions of release to modified to  
11 allow her to travel to Texas to attend the funeral of her sister.

12 IT IS FURTHER ORDERED that Mrs. Marcks provide Pretrial Services with her travel  
13 itinerary and update Pretrial Services with any unexpected changes during her travel.

14 DATED this 2nd day of November, 2023.

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17 UNITED STATES DISTRICT JUDGE  
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